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39 UNITED STATES DISTRICT COURT

40 NORTHERN DISTRICT OF CALIFORNIA

41 SAN FRANCISCO DIVISION

42 LOS ANGELES TIMES
43 COMMUNICATIONS LLC, KQED, INC.,
44 SAN FRANCISCO PROGRESSIVE
45 MEDIA CENTER,

46 Plaintiffs,
47 v.
48 RALPH DIAZ, ACTING SECRETARY OF
49 THE CALIFORNIA DEPARTMENT OF
50 CORRECTIONS AND
51 REHABILITATION, RONALD DAVIS,
52 WARDEN OF THE CALIFORNIA STATE
53 PRISON AT SAN QUENTIN,

54 Defendants.

55 Case No. 3:18-cv-02146-RS

56 **STIPULATION AND [PROPOSED]**
57 **ORDER SCHEDULING CASE**
58 **MANAGEMENT CONFERENCE**

59 Courtroom: 3, 17th Floor
60 Judge: Hon. Richard Seeborg

61 Date Filed: April 11, 2018

62 Trial Date: Not Yet Set

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65 **STIPULATION AND [PROPOSED] ORDER SCHEDULING CASE MANAGEMENT CONFERENCE**
66 Case No. 3:18-cv-02146-RS

67 1311120

1 Pursuant to Federal Rule of Civil Procedure 16 and Civil Local Rules 16 and 7-12,
2 Plaintiffs Los Angeles Times Communications LLC; KQED, Inc.; and San Francisco Progressive
3 Media Center, and Defendants Ralph Diaz and Ronald Davis, by and through their respective
4 counsel, enter into the following stipulation requesting that the Court schedule a case
5 management conference for February 14, 2019. The parties hereby stipulate as follows:

6 1. On April 11, 2018, Plaintiffs filed their Complaint in this action;

7 2. On May 3, 2018, Defendants responded to the Complaint by filing a Partial
8 Motion to Dismiss;

9 3. On August 17, 2018, the Court issued an order denying Defendants' Partial
10 Motion to Dismiss;

11 4. On August 31, 2018, Defendants filed an Answer to the Complaint;

12 5. The Court has not scheduled a case management conference or issued a scheduling
13 order in this matter;

14 6. The parties agree that a case management conference would facilitate the efficient
15 and expeditious litigation of this case;

16 7. On November 14, 2018, Plaintiffs requested that Defendants stipulate to a joint
17 request asking the Court to schedule a case management conference in the above-entitled matter.

18 8. Defendants requested that a case management conference be set on a mutually
19 agreeable date after the holiday season in late January or early February. Plaintiffs provided two
20 dates, January 24, 2019 and February 14, 2019, and Defendants chose February 14, 2019.

21 9. The parties stipulate and jointly request that the Court schedule a case
22 management conference in the above-captioned matter for February 14, 2019.

23
24 **SO STIPULATED AND AGREED.**

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1 Dated: December 18, 2018

KEKER, VAN NEST & PETERS LLP

2
3 By: /s/ Ajay S. Krishnan
AJAY S. KRISHNAN

4 Attorneys for Plaintiffs
5 San Francisco Progressive Media Center

6 Dated: December 18, 2018

DAVID WRIGHT TREMAINE LLP

7
8 By: /s/ Thomas R. Burke
THOMAS R. BURKE

9 Attorneys for Plaintiffs KQED, Inc. and Los
10 Angeles Times Communications LLC

11 Dated: December 17, 2018

12 By: /s/ Jay M. Goldman
13 JAY M. GOLDMAN
Supervising Deputy Attorney General

14 Attorneys for Defendants Ralph Diaz and
15 Ronald Davis

16 **ATTESTATION**

17 I, Ajay S. Krishnan, am the ECF user whose Login and Password authorized the filing of
18 this document. Under Civil Local Rule 5-1(i)(3), I attest that the other above signatories have
19 concurred in the filing of this document.

20 Dated: December 18, 2018

By: /s/ Ajay S. Krishnan
AJAY S. KRISHNAN

[PROPOSED] ORDER

The parties' stipulation having been considered, and good cause appearing therefor, a case management conference in this matter is scheduled for February 14, 2019 at 10:00 am

IT IS SO ORDERED.

Dated: 12/18/18

By: John Doe

HON. RICHARD SEEBORG
UNITED STATES DISTRICT COURT